

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:	)
	) Chapter 11
	)
YELLOW CORPORATION, <i>et al.</i> , <sup>1</sup>	) Case No. 23-11069 (CTG)
	)
Debtors.	) (Jointly Administered)
	)
	) Re: Docket No. 4974, 4975

---

**NOTICE OF FILING OF REVISED CLEAN AND BLACKLINE VERSIONS  
OF (I) SECOND AMENDED DISCLOSURE STATEMENT FOR THE SECOND  
AMENDED JOINT CHAPTER 11 PLAN OF YELLOW CORPORATION AND ITS  
DEBTOR AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY  
CODE; AND (II) SECOND AMENDED JOINT CHAPTER 11 PLAN OF YELLOW  
CORPORATION AND ITS DEBTOR AFFILIATES PURSUANT TO CHAPTER 11 OF  
THE BANKRUPTCY**

---

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On September 2, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4253] (the “Plan”) and the *Disclosure Statement for the Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4254] (the “Disclosure Statement”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).
  
2. On October 17, 2024, the Debtors filed the *First Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4580] (the “Amended Plan”) and the *First Amended Disclosure Statement for the*

---

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

*First Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4581] (the “Amended Disclosure Statement”).

3. On November 20, 2024, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4974] (the “Second Amended Plan”) and the *Second Amended Disclosure Statement for the Second Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 4975] (the “Second Amended Disclosure Statement”).

4. On November 21, 2024, the Court held a hearing to consider approval of the Second Amended Disclosure Statement and related solicitation procedures (the “Hearing”).

5. At the Hearing, the Court heard argument and comments from the Debtors and certain objecting parties with respect to additional revisions necessary to the Second Amended Disclosure Statement and Second Amended Plan.

6. Attached hereto as Exhibit A-1 is a revised version of the Second Amended Disclosure Statement incorporating additional revisions. The revised version has been circulated to the U.S. Trustee, and the U.S. Trustee has no objection. Attached hereto as Exhibit A-2 is a blackline comparison of the revised Second Amended Disclosure Statement against the Second Amended Disclosure Statement filed on November 20, 2024.

7. Attached hereto as Exhibit B-1 is a revised version of the Second Amended Plan incorporating additional revisions. The revised version has been circulated to the U.S. Trustee, and the U.S. Trustee has no objection. Attached hereto as Exhibit B-2 is a blackline comparison

of the revised Second Amended Plan against the Second Amended Plan filed on November 20, 2024.

Dated: November 21, 2024  
Wilmington, Delaware

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Peter J. Keane (DE Bar No. 5503)  
Edward A. Corma (DE Bar No. 6718)  
**PACHULSKI STANG ZIEHL & JONES LLP**  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: ljones@pszjlaw.com  
tcairns@pszjlaw.com  
pkeane@pszjlaw.com  
ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted pro hac vice)  
David Seligman, P.C. (admitted pro hac vice)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: patrick.nash@kirkland.com  
david.seligman@kirkland.com

-and-

Allyson B. Smith (admitted pro hac vice)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: allyson.smith@kirkland.com

*Co-Counsel for the Debtors and Debtors in Possession*